

1 BARRY J. PORTMAN
Federal Public Defender
2 CYNTHIA C. LIE
Assistant Federal Public Defender
3 160 West Santa Clara Street, Suite 575
San Jose, CA 95113
4 Telephone: (408) 291-7753
5 Counsel for Defendant CHANG

6
7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) No. CR-07-00554 JF
11)
Plaintiff,)
12)
vs.) DECLARATION OF COUNSEL IN
13) SUPPORT OF *EX PARTE* APPLICATION
DOMINIC CHANG,) FOR MODIFICATION OF PRETRIAL
14) RELEASE CONDITIONS
Defendant.)
15)
_____)

16 I, Cynthia C. Lie, hereby declare as follows:

17 1. I am the Assistant Federal Public Defender appointed to represent Dominic Chang
18 in the above-captioned matter, in which Mr. Chang is charged with three counts of tax evasion in
19 violation of Title 26, United States Code Section 7201..

20 2. On September 13, 2007, Mr. Chang appeared before this Court pursuant to a
21 summons. The Court released Mr. Chang on a \$50,000 personal recognizance bond secured by
22 his signature and established conditions of pretrial release. Among those conditions is a travel
23 restriction to the Northern District of California and Mr. Chang's surrender of his United States
24 Passport.

25 3. I am informed and believe that on September 17, 2007, Mr. Chang surrendered his
26

1 passport to the Clerk of the Court and supplied proof of compliance to United States Pretrial
2 Services that same day.

3 4. I am informed and believe that on July 24, 2007, prior to Mr. Chang's initial
4 appearance in this case, his uncle purchased tickets for Mr. Chang and his former wife to travel
5 to Hong Kong, in the People's Republic of China, for a family wedding scheduled for January 5,
6 2008. The date for Mr. Chang's travel to Hong Kong is scheduled for December 26, 2007; the
7 date for his return flight is January 10, 2008.

8 5. I am informed and believe that prior to his indictment but after he became aware
9 of the criminal investigation in this matter, Mr. Chang traveled to the People's Republic of China
10 and returned to the United States.

11 6. On November 8, 2007, I spoke with Assistant United States Attorney Thomas
12 Moore about Mr. Chang's proposed travel to Hong Kong. Mr. Moore indicated that he did not
13 oppose Mr. Chang's request.

14 7. On November 8, 2007, I e-mailed United States Pretrial Services Officer Anthony
15 Granados regarding Mr. Chang's proposed travel. On November 9, 2007, Mr. Granados replied
16 that he did not oppose Mr. Chang's request.

17 I declare that the foregoing is true and correct and of my personal knowledge, except as to
18 those matters stated on information and belief, and as to those matters, I believe them to be true.

19 Executed this 15th of November 2007 in San Jose, California.

20 s/_____
21 CYNTHIA C. LIE
22 Assistant Federal Public Defender
23
24
25
26